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8
9 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
10 **SAN FRANCISCO DIVISION**

11
12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
20 ☒ Affects both Debtors

21 ** All papers shall be filed in the Lead Case, No.*
22 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF RENEE RECORDS IN
SUPPORT OF REORGANIZED DEBTORS'
FORTY-FIFTH OMNIBUS OBJECTION TO
CLAIMS (REDUCED AND ALLOWED
CLAIMS)**

Response Deadline:
December 1, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: December 15, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Renee Records, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am the Claims Manager at Pacific Gas and Electric Company (the “Utility” or “PG&E,”
5 and, with PG&E Corporation, the “Debtors,” or, as reorganized pursuant to the Plan, the “Reorganized
6 Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”). I submit this Declaration
7 in support of the *Reorganized Debtors’ Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed*
8 *Claims)* (the “Omnibus Objection”),¹ filed contemporaneously herewith.

9 2. As part of my job duties, I manage, administer, and monitor third-party claims,
10 investigations, and incidents for final determination of property damage, bodily injury, and business
11 interruption. I oversee department caseload to ensure integrity and regulatory compliance. I develop and
12 present key analysis and reporting to enterprise officers, operations managers and clients regarding third-
13 party incidents.

14 3. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
15 my personal knowledge, the knowledge of other PG&E personnel working under and alongside me on
16 this matter, my discussions with the Reorganized Debtors’ various other advisors and counsel, and my
17 review of relevant documents and information. If called upon to testify, I would testify competently to
18 the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the
19 Reorganized Debtors.

20 4. The Reduced and Allowed Claims arise from alleged property damage occurring in the
21 ordinary course of the Debtors’ operations. Compensation for such Claims is determined by the Utility’s
22 Law Claims team applying California damages law principles and practices, pursuant to which such
23 Claims are compensated at the lesser of the cost of repairs or the current (depreciated) fair market value
24 of the damaged property. The Utility’s Law Claims team calculates depreciation to determine fair market
25 value based on established internal guidelines, applied consistently to all such Claims. The amounts
26 listed in **Exhibit 1** reflect the amounts for which the Reorganized Debtors believe they are liable based

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28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Omnibus Objection.

upon these calculations.

5. The Reorganized Debtors determined these amounts based, in part, upon information provided to them by the Claimants. If a Claimant believes that the amount is too low, it must submit additional evidence in support of its Claim. However, the California Public Utilities Code requires the Reorganized Debtors treat all Claimants equally; accordingly, the Reorganized Debtors are not permitted to make concessions or accommodations for one Claimant without making similar concessions or accommodations to all other similarly situated Claimants. Accordingly, the amounts set forth in **Exhibit 1** only can only be revised with the introduction of additional damages evidence, and not for any other basis.

6. If not allowed at the Reduced Amount, the Reduced and Allowed Claims potentially could allow the applicable Claimants to receive recoveries to which they are not entitled.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed this fifth day of November , 2020, in San Ramon, California.

/s/ Renee Records
Renee Records